IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

§		
§		
8		
8		
3 8	CASENO	7:20 CV 084
8	CASE NO.	7.20-C V-00 4
§		
§		
§		
§		
§		
8		
§		
	***	<pre>\$</pre>

JOINT STATUS REPORT

COMES NOW, Plaintiff, UNITED STATES OF AMERICA, and Defendant, TAX RANCH, LLC, and jointly file this Status Report in compliance with the Court's July 16, 2021 Order¹ and inform the Court as follows:

1. On March 27, 2020, the United States filed a Declaration of Taking for the condemnation of a fee simple interest in real property identified as Tracts RGV-WSL-1012 and RGV-WSL-1022.² Defendants Tax Ranch, LLC and Pablo (Paul) Villarreal, Hidalgo County Tax Assessor-Collector ("Defendant") were identified as interest owners in Schedule "G" of the Declaration of Taking and Complaint in Condemnation.³ On August 2, 2021, Pablo (Paul) Villarreal, Hidalgo County Tax Assessor-Collector, executed a disclaimer which was filed and is currently pending

² Dkt. No. 2.

¹ Dkt. No. 33.

³ Dkt. Nos. 1 and 2.

before the Court.⁴ Accordingly, Tax Ranch, LLC ("Defendant") is the sole interest owner of Tracts RGV-WSL-1012 and RGV-WSL-1022.

2. On May 6, 2020, the United States deposited Sixty-Three Thousand Thirty Dollars and 00/100 (\$63,030.00) into the Registry of the Court as estimated just compensation for Tracts RGV-WSL-1012 and RGV-WSL-1022.⁵

3. During mediation that took place on July 9, 2021, the parties settled the amount of just compensation owed to Defendant in this matter.

4. On July 13, 2021, the parties filed a Joint Status Report and Notice of Settlement informing this Court of the above.⁶

5. On July 23, 2021, the United States deposited a supplemental amount of Seventy-One Thousand Nine Hundred Seventy Dollars and 00/100 (\$71,970.00) into the Registry of the Court for the just compensation as agreed upon for Tracts RGV-WSL-1012 and RGV-WSL-1022.⁷ Accordingly, the total amount currently deposited into the Registry of the Court, which reflects the just compensation amount per the settlement between the parties, is One Hundred Thirty-Five Thousand Dollars and 00/100 (\$135,000.00).

6. In compliance with the Court's July 16, 2021 Order, 8 the parties now file this Status Report and inform the Court that on August 9, 2021, the parties filed their Joint Motion for Order Establishing Just Compensation, Granting Possession, and Distributing Funds on Deposit in the Registry of the Court for Tracts RGV-WSL-1012 and RGV-WSL-1022, which is currently pending before the Court. 9

⁴ Dkt. No. 35.

⁵ Dkt. No. 6.

⁶ Dkt. No. 30.

⁷ Dkt. No. 34.

⁸ Dkt. No. 33.

⁹ Dkt. No. 36.

WHEREFORE, the parties respectfully request this Court be informed as to the aforementioned.

Respectfully submitted,

FOR DEFENDANT: With Permission

JENNIFER B. LOWERY
Acting United States Attorney
Southern District of Texas

s | Lance A. Kirby

LANCE A. KIRBY

Jones, Galligan, Key & Lozano, L.L.P. 2300 W. Pike Blvd., #300 Weslaco, Texas 78596

Telephone: (956) 968-5402 Facsimile: (956) 969-9402 E-mail: lakirby@jgkl.com

Attorney in Charge for Defendant

Tax Ranch, LLC

By: s/ Alyssa Iglesias

ALYSSA IGLESIAS

Assistant United States Attorney

Southern District of Texas No.: 3610302

Florida Bar No.: 103383

1701 W. Bus. Highway 83, Suite 600

McAllen, TX 78501 Telephone: (956) 992-9351 Facsimile: (956) 992-9425

E-mail: <u>Alyssa.Iglesias@usdoj.gov</u> Attorney-In-Charge for United States

CERTIFICATE OF SERVICE

I, Alyssa Iglesias, Assistant United States Attorney for the Southern District of Texas, do hereby certify that on September 1, 2021, a copy of the foregoing was served on all parties in accordance with the Federal Rules of Civil Procedure.

By: s/ Alyssa Iglesias_

ALYSSA IGLESIAS

Assistant United States Attorney